

procedures, recommendations and other related documents.

3. Federal Rule of Civil Procedure 26(c) allows the court on motion of any party to make a protective order limiting, conditioning or regulating discovery.

4. Because of the confidential nature of certain documents requested by Plaintiffs in their Request for Production of Documents, the parties have agreed to request this Court to enter the Protective Order attached hereto as Exhibit "A" in order to properly regulate the disclosure of those confidential materials.

WHEREFORE defendant, USAA CASUALTY INSURANCE COMPANY, prays for entry of the Protective Order attached hereto as Exhibit "A", as agreed by the parties.

Respectfully Submitted,

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By: /s/ Esther Joy Schwartz
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